



Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

SHARED SERVICES

March 20, 2002

In reply refer to: CT-1

Ms. Carol Wolf
Headquarters FOIA/Privacy Act Division
MA-73, Room 1G-051
Department of Energy
Washington, D.C. 20585

Dear Ms. Wolf:

We are in receipt of Abel Lopez's letter dated January 15, transmitting two FOIA requests submitted to DOE by Reece Rushing, OMB Watch, and Thomas B. Cochran, Natural Resources Defense Council.

As requested, enclosed are two groups of documents as follows:

1. documents created by the DOE, or documents created by another Federal entity and received by DOE, that mention the removal of DOE documents from DOE public reading rooms, and/or the removal of web pages from DOE web sites, and
2. the identity of each web page that has been removed from a DOE web site since September 11, 2001.

With respect to the first item, we have identified only two documents and one e-mail chain consisting of three pages. These items are enclosed and are marked "Group 1." As you previously suggested, we have put brackets around the information contained in these documents that BPA does not want to release under FOIA.

With respect to the second item, we have only identified the web pages that have been removed from access via BPA's External Web Page. These items are listed on an enclosure marked "Group 2." These specific web pages were all removed in direct response to the October 26 Memorandum from Deputy Secretary Blake. Two of these items were removed because they provided: "...personal data on Federal and contractor employee." The other three items were removed because they provided: "...detailed site/facility maps" that could be used in targeting DOE sites for terrorist attacks.

It is our recommendation that the URL's and descriptions of the web sites (particularly the names of specific facilities) be withheld from release under FOIA. BPA has not removed

information regarding all its facilities from public websites. BPA has only removed information regarding facilities and maps regarding facilities it considers to be critical and therefore could be used to target DOE sites for terrorist attacks. Disclosing the names, descriptions, and/or URL's associated with these facilities would publicly identify the facilities BPA considers critical to its operations.

We suggest Exemption 2 protection of internal agency documents applies to this material because (1) the data requested is predominately internal and, (2) disclosure would significantly risk circumvention of agency statutes or regulations.

Access to information concerning critically important BPA facilities has been removed pursuant to the Deputy Secretary's directive. Availability of such data can put such facilities at risk of terrorist attack by: 1) identifying critical facility location; 2) identifying critical facility type; and 3) identifying critical facility components. BPA is responsible for providing safe, continued and reliable electric energy service to a region of over 300,000 square miles and more than 10,000,000 end users. BPA services critically important military loads. BPA provides 80% of the high voltage transmission in the Pacific Northwest and essential interconnections with Canada, California and the southwest. The Regional economy is very much dependent on BPA being up and operational at all times. Providing a potential terrorist with precise location/operational information undermines our ability to meet both statutory and regulatory requirements. We are required by statute to provide continuous, safe and reliable electrical service to our customers and the greater public. Release of this information would significantly risk circumvention of our statutory mandate.

Also enclosed is a completed Freedom of Information Act Request Certification. If you have any questions, please contact Mike Berg, Security Specialist, at (503) 230-4274.

Sincerely,



Gene Tollefson
Freedom of Information Act Officer

Enclosures:
Group 1 (described above)
Group 2 (described above)
FOIA Request Certification